

FCC Rules Committee,

Wilderness Wireless is a WISP (Wireless Internet Service Provider) focused on connecting areas which are underserved, particularly rural citizens of the Northwest US who have no other choice for quality bandwidth or very limited choices for high speed internet.

Wilderness Wireless currently serves approximately 1,300 customers in rural areas of Idaho and Oregon. Some of our service areas are very remote and we have built extensive networks of mountain top sites to service these areas as National wireline and wireless providers view these areas as too hard or unprofitable to service. Despite the unique and very difficult challenges of these areas we are able to deliver speeds to these underserved rural customers of up to 16Mb, which far exceeds other potential sources of broadband available.

Since the publication of preliminary rules for the CBRS "innovation" band we have invested a significant amount of our R&D budget into some preliminary radio technology to utilize this band and we are testing that technology now. If the FCC will allow Wilderness Wireless and other WISPs to use this band we will be able to connect customers that are requesting service now that we can not connect due to Line of Sight limitations that we currently can not solve without use of this spectrum, the new rules, and the new technology in the radios that are poised to release soon.

As with any spectrum that we have available, it is soon filled up with customer demand and demand for more bandwidth and higher speeds. In order to maximize Wilderness Wireless future growth plans into more underserved areas we will need access to the full 100MHz of mid band spectrum as currently proposed. Having access to the full 100MHz will allow us to serve more rural citizens with higher speeds, better Quality of Service (QOS) and higher level of reliability.

As we have seen over the years with other spectrum debates with large National carriers, if this spectrum is awarded to them, they will not use it in the areas we serve. Many of our service areas have no cellular service of any kind from any cellular carrier. From the perspective of Wilderness Wireless the current proposed rules for the CBRS band allow access to new spectrum in the innovation band in urban areas where the national cellular carriers can take best advantage of that spectrum and there is no need to modify those rules as proposed.

If the FCC sees fit to free up this spectrum for use in rural areas we will apply for regional license and we will put this spectrum to use to deliver quality internet service to areas that are now underserved. If CBRS spectrum is awarded to a national cellular carrier in these rural areas the spectrum will be silent and provide no value to anyone.

Wilderness Wireless opposes the proposal to increase the size of PALs and increase the length of the licenses awarded as these moves are only in the interest of a few large carriers and not in the best interest of the rural citizens of the US.

Thank you for listening to our concerns and we hope that the FCC can side with the underserved rural citizens of the US and WISPs who are trying to solve this problem for the best use of the CBRS spectrum.

Sincerely,

Neil Neiwert
President, Wilderness Wireless

Kelly Hogan
CEO, Wilderness Wireless

Neil Neiwert

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